1 THE HONORABLE MARSHA J. PECHMAN 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 JAVELIN LOGISTICS CORPORATION, Civil Action No. 2:17-cv-00958-MJP AS SUBROGOR AND FOR THE USE AND 10 BENEFIT OF THROUGH TRANSPORT STIPULATION AND ORDER MUTUAL INSURANCE ASSOCIATION, FOR EXTENSION OF DEADLINE TO 11 LTD. D/B/A T.T. CLUB, FILE DISCOVERY MOTIONS 12 Plaintiff. 13 v. 14 SONIQ SERVICES, INC., d/b/a SONIQ TRANSPORTATION AND WAREHOUSE. 15 DHL EXPRESS (USA), INC., DHL De GUATEMALA, 16 Defendants. 17 18 **STIPULATION** 19 The parties hereby agree and stipulate that the current deadline for all motions related 20 to discovery (ECF No. 27) should be extended from the current date of April 18, 2018 to 21 May 4, 2018. The parties agree and stipulate that good cause exists for the extension of this 22 deadline in order to allow additional time for the DHL defendants to supplement their 23

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responses to Plaintiff's discovery requests and potentially avoid motion practice relating to 1 2 same, if possible. DATED this 11th day of April, 2018. 3 FORSBERG & UMLAUF, P.S. 4 LE GROS BUCHANAN & PAUL By: s/ Ken M. Roessler (via email 5 authorization) By: s/ Markus B.G. Oberg Ken M. Roessler, WSBA #31886 By: s/ Daniel J. Park 6 901 Fifth Avenue, Suite 1400 Markus B.G. Oberg, WSBA #34914 Seattle, WA 98164 Daniel J. Park, WSBA #42748 7 4025 Delridge Way SW, Suite 500 Phone: (206) 689-8500 Seattle, WA 98106-1271 Email: kroessler@foum.law 8 Attorneys for Soniq Services, Inc. Phone: (206) 623-4990 9 Email: moberg@legros.com dpark@legros.com 10 Attorneys for Plaintiff Javelin Logistics Corporation, as subrogor and for the use and 11 benefit of Through Transport Mutual 12 Insurance Association Ltd. d/b/a T.T. Club 13 TYSON & MENDES, LLP 14 By: s/ Levi Bendele (via email authorization) 15 Levi Bendele, WSBA #26411 200 West Mercer Street, Suite 411 16 Seattle, WA 98119 Phone: (206) 420-4267 17 Email: lbendele@tysonmendes.com Attorneys for Defendants DHL Express 18 (USA), Inc. and DHL De Guatemala 19 20 // 21 // 22 // 23 //

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1 **ORDER** 2 PURSUANT TO THE FOREGOING STIPULATION, there is good cause for the 3 extension requested and it is hereby ORDERED that the deadline for all motions related to 4 discovery is extended from April 18, 2018 to May 4, 2018. 5 DATED this 17 day of Opil, 2018. 6 7 8 9 Presented by: 10 LE GROS BUCHANAN & PAUL 11 By: s/ Markus B.G. Oberg By: s/ Daniel J. Park 12 Markus B.G. Oberg, WSBA #34914 Daniel J. Park, WSBA #42748 13 4025 Delridge Way SW, Suite 500 Seattle, WA 98106-1271 14 Telephone: (206) 623-4990 Fax: (206) 467-4828 15 Email: moberg@legros.com dpark@legros.com 16 Attorneys for Plaintiff Javelin Logistics Corporation, as subrogor and for the 17 use and benefit of Through Transport Mutual Insurance Association Ltd. d/b/a T.T. Club 18 19 20 21 22

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1 **CERTIFICATE OF SERVICE** 2 I hereby certify that on April 11, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, 3 which will send notification of such filing to The Honorable Marsha J. Pechman, and serve it on all associated counsel. 4 Ken M. Roessler, WSBA #31886 5 FORSBERG & UMLAUF, P.S. 901 Fifth Avenue, Suite 1400 Seattle, WA 98164 6 Direct: 206.346.3922 Office: 206.689.8500 7 kroessler@foum.law; lyndaha@foum.law 8 Attorney for Soniq Services, Inc. Levi Bendele, WSBA #26411 9 Robert Taitz TYSON & MENDES, LLP 10 200 West Mercer Street, Suite 411 Seattle, WA 98119 Phone: 206.420.4267 11 lbendele@tysonmendes.com rtaitz@tysonmendes.com 12 lgeissinger@tysonmendes.com; Attorneys for Defendants DHL Express (USA), 13 Inc. and DHL De Guatemala I certify under penalty of perjury under the laws of the State of 14 Washington that the foregoing is true and correct. 15 Signed at Seattle, Washington this 11th day of April, 2018. 16 s/ Shelley Courter_ 17 Shelley Courter, Legal Assistant LeGros Buchanan & Paul 4025 Delridge Way SW, Suite 500 18 Seattle, Washington 98106-1271 19 206-623-4990 Telephone: 206-467-4828 Facsimile: 20 scourter@legros.com E-mail: 21 22 23

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